

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

RUBEN ESCANO,

Plaintiff,

v.

RCI, LLC, a Delaware Corporation et al.

Defendants.

Case No. 2:22-cv-00360-DHU-GJF

PLAINTIFF'S LIST OF EXHIBITS

Plaintiff Ruben Escano, undersigned, pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's Order dated April 10, 2024 (Doc. 220), files this List of Exhibits, except impeachment and rebuttal exhibits:

Plaintiff Expects to Offer:

<u>Exhibit No.</u>	<u>Date</u>	<u>Description</u>
1		Call List
2	2/18/2018	Audio Recording of February 18, 2018 Phone Call, Part 1
3	2/18/2018	Audio Recording of February 18, 2018 Phone Call, Part 2
4	4/3/2018	Audio Recording of April 3, 2018 Phone Call
5	4/16/2018	Audio Recording of April 16, 2018 Phone Call
6	4/23/2018	Audio Recording of April 23, 2018 Phone Call
7	5/1/2018	Audio Recording of May 1, 2018 Phone Call
8	5/3/2018	Audio Recording of May 3, 2018 Phone Call

9	5/8/2018	Audio Recording of May 8, 2018 Phone Call
10	5/14/2018	Audio Recording of First May 14, 2018 Phone Call
11	5/14/2018	Audio Recording of Second May 14, 2018 Phone Call
12	5/1/2019	Audio Recording of May 1, 2019 Phone Call
13	6/3/2019	Audio Recording of June 3, 2019 Phone Call
14	6/4/2019	Audio Recording of June 4, 2019 Phone Call
15	9/10/2019	Audio Recording of September 10, 2019 Phone Call
16		Compilation Audio Recording Transcripts
17	2/7/2021	"Johnson and Johnson" Caller ID Phone Screenshot
18		Wyndham 2018 Form 10-K
19	6/25/2018	Do Not Call Registry Email Confirmation
20		Compilation Phone Bills
21		Credit Card Statement
22	2/9/2023	MXRRU's Initial Disclosures
23	1/24/2012 - 3/9/2023	MXRRU Compilation Annual Reports
24	7/22/2011	2011 Letter from the Canadian Radio-television and Telecommunications Commission to Orlando Arroyo, re: Telemarketing calls to consumers in Canada, https://crtc.gc.ca/eng/archive/2011/lt110722d.htm
25	4/23/2008	Affiliation Agreement between RCI and Orlando Arroyo
25-A		Affiliation Agreement between RCI and Orlando Arroyo (English Translation)
25-B	3/29/2024	Certificate of Translation of Affiliation Agreement between RCI and Orlando Arroyo

26	8/3/2018	Amendment to Affiliation Agreement between RCI and Orlando Arroyo
26-A		Amendment to Affiliation Agreement between RCI and Orlando Arroyo (English Translation)
26-B	3/29/2024	Certificate of Translation of Amendment to Affiliation Agreement between RCI and Orlando Arroyo
27		Sunset World Resorts Webpage, https://www.sunsetworldresorts.com/resorts/ , archived at https://perma.cc/LMR6-VVLP
28	6/22/2017	2017 FCC Notice of Apparent Liability for Forfeiture (FCC 17-80)
29	10/17/2011	News Article – Law360, <i>Canada Reaches Deal with Mexican Robocallers</i>
30	6/23/2017	News Article – Miami New Times, <i>Miami Man Fined \$120 Million for Making 96 Million Robocalls in Three Months</i>
31	6/27/2017	News Article – Yahoo News, <i>How TripAdvisor hunted a robocaller that made 100 million calls to random people</i>
32	8/21/2020	PRWeb.com Press Release, <i>Sunset World Group Reaffirms its Leadership in the Vacation Industry Receiving Various Recognitions from RCI</i>
33	8/15/2018	2018 Phone Arena Article
34	4/3/2018	Email from Premier Cancun Vacations to Ruben Escano
35	4/3/2018	Invoice from Premier Cancun Vacations to Ruben Escano
36	8/26/2012	Invoice from Premier Cancun Vacations to Juan Soto, http://bpo.m4sunset.com/M4C/PurchaseLetterESP.php?IDBOOKING=141326448 , archived at https://perma.cc/GBS3-DZ7E
37	5/6/2012	Invoice from Premier Cancun Vacations to Ivonne Figueroa, http://bpo.m4sunset.com/M4C/PurchaseLetterVacTVLatam.php?IDBOOKING=609301571 , archived at https://perma.cc/F9G8-YQ2R
38	8/10/2005	Invoice from Premier Cancun Vacations to Torres Beatriz, http://bpo.m4sunset.com/M4C/M4CBIENVENIDO.php?IDBOOKING=6 , archived at https://perma.cc/8H92-G4AP

39	4/8/2013	Invoice from Premier Cancun Vacations to Bruce Villareal, http://bpo.m4sunset.com/M4C/PurchaseLetter.php?IDBOOKING=610000999 , archived at https://perma.cc/Q9EZ-2KVY
40	5/16/2018	Invoice from Premier Cancun Vacations to Samuel Gaines, http://bpo.m4sunset.com/M4C/PurchaseLetter.php?IDBOOKING=720000228 , archived at https://perma.cc/SC5N-MJTX
41	3/2/2012	Invoice from Premier Cancun Vacations to Willaim Mosquera, http://bpo.m4sunset.com/M4C/PLShare.php?IDBOOKING=607250825 , archived at https://perma.cc/2L2U-BJ4X
42	8/24/2012	Invoice from Premier Cancun Vacations to Gerado Brown, http://bpo.m4sunset.com/M4C/PLShare.php?IDBOOKING=140953859 , archived at https://perma.cc/K8RQ-C8NW
43	9/1/2016	Invoice from Premier Cancun Vacations to Amable Perez, http://bpo.m4sunset.com/M4C/CartaCompraLATAM.php?IDBOOKING=665751407 , archived at https://perma.cc/P6ZB-KEXG
44	10/8/2016	Invoice from Premier Cancun Vacations to Jose Bravo, http://bpo.m4sunset.com/M4C/CartaCompraSHARE.php?IDBOOKING=140956275 , archived at https://perma.cc/WA35-TYJY
45	10/8/2016	Invoice from Premier Cancun Vacations to Teresita Magno, http://bpo.m4sunset.com/M4C/PurchaseLetter.php?IDBOOKING=682000064 , archived at https://perma.cc/4Z2Y-W397
46	11/23/2018	Email Receipt for Pixel 3 XL
47	11/28/2020	Email Receipt for iPhone 12 Pro
48	2/1/2021	Letter - RCI's Response to Plaintiff's Demand Letter
49		Sunset World Promotional Booklet, https://www.sunsetworldresorts.com/sw2018/wp-content/uploads/2022/11/Book3_Companies.pdf
50	3/20/2023	Timescape's Answers and Objections to Plaintiff's First Set of Interrogatories
51	6/30/2023	Timescape's Response to Plaintiff's Third Set of Interrogatories
52	9/21/2022	Timescape's Response to Marriott Subpoena

53	4/28/2022	Marriott Subpoena to Timescape
54	10/25/2016	Access and Use License Agreement between Timescape and Ascendant
55	10/26/2016	Timescape Lease Agreement with Ascendant
56	10/25/2016	Sales Agreement Between Timescape and Ascendant
57	3/24/2023	RCI's Response to Plaintiff's First Set of Interrogatories
58	8/14/2023	RCI's Supplemental Response to Plaintiff's First and Second Set of Interrogatories
59	9/11/2023	RCI's Response to Plaintiff's Third Set of Requests for Production
60	10/6/2023	RCI's Supplemental Response to Plaintiff's Third Set of Requests for Production
61	6/30/2021	RCI Master Points Corporate Affiliation Agreement
62	1/2/2021	RCI Master Weeks Affiliation Agreement
63	8/16/2020	Amendment No. 1 to Master Points Platinum Corporate Affiliation Agreement between RCI, Timescape, and Ascendant
64	8/14/2020	Shared Services Agreement between RCI and Timescape
65	8/3/2020	Amendment No. 2 to Master Corporate Affiliation Agreement between RCI and Timescape
66	2/14/2018	Letter Agreement between RCI and Timescape
67	12/20/2017	Master Points Platinum Corporate Affiliation Agreement between RCI, Timescape, and Ascendant
68	11/4/2015	Amendment No. 1 to Master Points Corporate Affiliation Agreement between RCI and Timescape
69	8/18/2015	Letter Agreement between RCI and Timescape with Attachments
70	5/20/2015	Letter Agreement between RCI and Timescape

71		Addendum to the RCI Weeks Procedures Manual & RCI Points Procedures Manual: RCI Rules & Governance in Relation to the Use of 3rd Party Marketers & Brokers
72		Addendum to the RCI Points Procedures Manual: RCI Rules & Governance in Relation to the Use of 3rd Party Marketers & Brokers
73		RCI Weeks Procedures Manual
74		RCI Points Procedures Manual
75	12/21/2021	Original LinkedIn Page for Christopher Thomas
76	February 2022	Edited LinkedIn Page for Christopher Thomas
77	2/3/2021	<i>Bryan v. RCI, LLC</i> – Complaint
78	10/22/2021	<i>Bryan v. RCI, LLC</i> - Plaintiff's Motion for Voluntary Dismissal
79	11/12/2021	<i>Bryan v. RCI, LLC</i> - Plaintiff's Reply in Support of Motion for Voluntary Dismissal
80	6/10/2013	<i>Hossfeld v. RCI, LLC</i> – Complaint
81	3/30/2016	<i>Edward Makaron v. World Wide Vacations</i> – Complaint
82	9/14/2016	<i>Snook v. RCI, LLC</i> – Complaint
83	3/14/2018	<i>Mintz v. RCI Company</i> – Complaint
84	5/31/2018	<i>James Andrews v. RCI, LLC</i> – Complaint
85	9/23/2019	<i>Cunningham v. Lifestyles Development LLC</i> - Amended Complaint
86	7/28/2020	<i>Williams Young v. RCI, LLC</i> – Complaint
87	7/30/2021	<i>Marks v. RCI, LLC</i> – Complaint
88	7/12/2023	<i>Wilkins v. RCI, LLC</i> - Second Amended Complaint with Exhibits
89	12/31/2013	<i>Righetti v. United Shuttle Alliance Transportation</i> - Second Amended Complaint
90	4/25/2017	<i>Mesh v. RCI, LLC</i> – Complaint

91	6/7/2017	<i>Mesh v. RCI, LLC</i> - Amended Complaint
92	10/22/2019	<i>Diamond Motorworks v. Wyndham Destinations, Inc.</i> – Complaint
93	7/12/2018	Letter from Florida Department of Consumer Services to RCI, re: Juan Castro Do Not Call Complaint against RCI
94	7/5/2018	Florida Department of Consumer Services, Juan Castro Do Not Call Complaint against RCI
95	5/15/2018	Letter from Pennsylvania Attorney General’s Office to RCI, re: Verna Cole Do Not Call Complaint against RCI
96	7/12/2018	Demand Letter from Jared Johnson to RCI, re: Telemarketing Complaint
97	8/28/2023	TrackResults - Homepage, https://www.trackresults.com , archived at https://perma.cc/VE3A-2MLQ
98	6/29/2017	Perspective Magazine, <i>Sunset World Resorts and Vacation Experiences Partners With TrackResults For Enhanced Sales & Marketing</i> , https://perspectivemagazine.com/290620177747/sunset-world-resorts-and-vacation-experiences-partners-with-trackresults-for-enhanced-sales-marketing , archived at https://perma.cc/QRH7-DGSF
99	9/1/2017	TrackResults, <i>Holidays Network Group Joins the TrackResults Family</i> , https://www.trackresults.com/holidays-network-group-joins-the-trackresults-family , archived at https://perma.cc/LY6Y-FMEW
100	10/19/2024	TrackResults - Client Testimonials, https://www.trackresults.com/client-testimonials-2 , archived at https://perma.cc/M4NT-QX4B
101	12/16/2021	TrackResults - Client Growth, https://www.trackresults.com/trackresults-client-growth , archived at https://perma.cc/NY4M-ZVRV
102		RCI 2017 Strategic Sourcing Document, https://www.rciaffiliates.com/media/567029/172065ss-q4-rci-supplier-directory.pdf
103	8/2/2023	Indeed.com - Parliament Marketing Job Posting

104	8/5/2023	SimplyHired.com - Parliament Marketing Job Posting
105	June 2022	Google Maps Streetview - 3855 South 500 West Suite S, https://www.google.com/maps/@40.6874029,-111.9043426,3a,15y,13.03h,87.88t/data=!3m6!1e1!3m4!1sAHQwVFfEsCQz5RTNTtsKhg!2e0!7i16384!8i8192
106	7/31/05 – 11/29/21	Parliament Marketing Group, LLC – Compilation Utah Filings
107	7/6/2006 – 8/15/2024	TrackResults Software, LLC – Compilation Utah Filings
108	2/17/2016 – 4/16/2024	SORAG, Inc. – Compilation Florida Filings
109	1/8/2016 – 5/1/2024	Ascendant Holidays, LLC – Compilation Florida Filings
110	9/15/2015 – 5/1/2024	Holidays Network Group, LLC – Compilation Florida Filings
111	10/15/2023	Facebook - Marketing 4 Sunset Group, https://www.facebook.com/Marketing4SunsetGroup/ , archived at https://perma.cc/4FX7-TGPS
112	10/19/2024	Computrabajo.com – Marketing 4 Sunset Group, https://mx.computrabajo.com/marketing4sunsetgroup , archived at https://perma.cc/V864-GJ2J
113	10/19/2024	MyCancunTrip Homepage, https://mycancuntrip.com , archived at https://perma.cc/SD98-ZUL8
114	11/3/2022	<i>Marriott International Inc v. Dynasty Marketing Group, LLC</i> – Excerpt of Deposition of Bruno Borra
115	3/17/2021	<i>Jorge Bravo v. Huesca</i> – Amended Complaint
116	4/30/2021	Travel and Leisure Co - Q1 2021 Results - Earnings Call Transcript, https://seekingalpha.com/article/4423268-travel-leisure-co-tnl-ceo-michael-brown-on-q1-2021-results-earnings-call-transcript

117	5/11/2018	News Article - CNN, <i>Accused robocall 'kingpin' fined a record \$120 million</i> , https://money.cnn.com/2018/05/11/news/fcc-robocall-fine/index.html
118	4/19/2018	News Article - Newsweek, <i>Who Is Adrian Abramovich? Miami Man Accused of Making 97 Million Robocalls Fights \$120 Million Fine</i> , https://www.newsweek.com/who-adrian-abramovich-miami-man-accused-making-97-million-robocalls-fights-120-892275
119	5/18/2018	News Article - Thomson Reuters, <i>FCC Imposes Largest Forfeiture Ever For Illegal 'Neighbor Spoofing' Robocalls</i> , https://anzlaw.thomsonreuters.com/w-014-7266
120	5/10/2018	News Article - CNET, <i>FCC makes \$120M robocall fine for Florida man official</i> , https://www.cnet.com/tech/mobile/fcc-makes-120-million-robocall-fine-for-florida-man-official/
121	5/11/2018	News Article - USA Today, <i>FCC fines robocaller \$120 million for making nearly 100 million calls</i> , https://www.usatoday.com/story/tech/news/2018/05/11/robocaller-fined-120-million-fcc-nearly-100-million-spoofed-calls/601287002/
122	5/11/2018	News Article - BBC, <i>Record \$120m fine for nuisance robocalls</i> , https://www.bbc.com/news/technology-44083073
123	5/10/2018	News Article - CBS News, <i>Robocaller hit with record \$120 million fine</i> , https://www.cbsnews.com/news/robocaller-hit-with-record-120-million-fine/
124	6/22/2017	News Article - NPR, <i>Man Accused Of Making Millions Of Robocalls Faces Biggest-Ever FCC Fine</i> , https://www.npr.org/sections/thetwo-way/2017/06/22/533970545/man-accused-of-making-millions-of-robocalls-faces-biggest-ever-fcc-fine
125	6/23/2017	News Article - CNET, <i>Alleged robocall scammer faces \$120 million fine</i> , https://www.cnet.com/culture/fcc-wants-alleged-robocall-scam-artist-to-pay-120-million/
126	6/22/2017	News Article - The Hill, <i>FCC proposes \$122M fine on robocall scammer</i> , https://thehill.com/policy/technology/338999-fcc-proposes-122m-fine-on-robocall-scammer/
127	6/22/2017	News Article - USA Today, <i>FCC hits robocaller with agency's largest-ever fine of \$120 million</i> , https://www.usatoday.com/story/tech/news/2017/06/22/fcc-hits-

		robocaller-agencys-largest-ever-fine-120-million/103102546/
128	6/23/2017	News Article - CBS News, <i>FCC proposes record \$120 million fine for man in robocall scheme</i> , https://www.cbsnews.com/news/fcc-robocall-fine-telephone-spoofing/
129	6/22/2017	News Article - Wall Street Journal, <i>FCC Fines Man \$120 Million for His 100 Million Robocalls</i> , https://www.wsj.com/articles/fcc-proposes-120-million-fine-against-miami-telemarketer-1498152920
130	9/9/2024	RCI Webpage - Sunset Marina Resort and Yacht Club, https://www.rci.com/pre-rci/us/en/special-offers/mexico/5237-sunset-marina-resort-and-yacht-club , archived at https://perma.cc/SU4E-JXYM
131	9/9/2024	RCI Webpage - Sunset Royal Beach, https://www.rci.com/resort-directory/resortDetails?resortCode=4363 , archived at https://perma.cc/M73E-QWYK
132	9/9/2024	RCI Webpage - Sunset Fishermen Spa & Resort, https://www.rci.com/resort-directory/resortDetails?resortCode=5705 , archived at https://perma.cc/VC5B-3VC2
133	9/9/2024	RCI Webpage - Hacienda Tres Rios, https://www.rci.com/resort-directory/resortDetails?resortCode=A475 , archived at https://perma.cc/KYA2-VCXP
134	9/9/2024	RCI Webpage - Sunset World, https://www.rci.com/pre-rci/uy/es/landing/sunset , archived at https://perma.cc/AV98-CETS

Plaintiff May Offer:

135		Deposition, or a portion thereof, of Jennifer Dongus, RCI corporate designee
136		Deposition, or a portion thereof, of Crystian Alatorre, RCI corporate designee

Dated this 21st day of October, 2024.

Respectfully submitted,

/s/ Ruben J. Escano

Ruben J. Escano, *pro se*
2311 Ranch Club Road
Suite #2-180
Silver City, NM 88061
rubenescano@gmail.com
(201) 527-8938

IT IS HEREBY CERTIFIED that on this 21st day of October, 2024, the foregoing was filed electronically through the CM/ECF system, causing all parties or counsel of record to be served by electronic means, as more fully reflected in the Notice of Electronic Filing.

By: /s/ Ruben J. Escano

Ruben J. Escano, *pro se*